

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

SHARON GORE,

Plaintiff,

v.

**RONALD LARRY FOSTER and
ALICE DUBOSE,**

Defendants.

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CASE NO.: 3:06-CV-167-WKW

MOTION TO AMEND COMPLAINT

COMES NOW the Plaintiff, Sharon Gore, the personal representative of the estate of Tullis Gore, and moves this Honorable Court for an Order permitting her to amend the Complaint in this matter. This Motion to Amend is timely filed under the Scheduling Order governing this action.

The Plaintiff wishes to amend the complaint in order to add a defendant, Farfard, Inc., who was disclosed to the Plaintiff through Defendant Alice Dubose's answers to interrogatories on August 3, 2006 and her deposition on August 11, 2006.

A copy of the proposed Second Amended Complaint is attached hereto as Exhibit A.

Respectfully submitted on the 14th day of August, 2006.

/s Randall S. Haynes
Attorney for Plaintiff (HAY006)

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on this the 14th day of August, 2006, I electronically filed the foregoing Motion to Amend Complaint with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record in the above referenced case, including:

David Lee, Esq.
PARSONS, LEE & JULIANO
Suite 300, 2801 Hwy. 280 S.
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/s Randall S. Haynes

OF COUNSEL